

July 15, 2004

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STD. CONTROL PROGRAM

Food and Drug Administration Dockets Management Branch 12420 Parklawn Drive – Room 1-23 Rockville, MD 20857

To Whom It May Concern,

The National Coalition of STD Directors (NCSD) supports the San Francisco Department of Public Health, STD Prevention and Control Division's petition, "Petition to the Food and Drug Administration to change the labeling and take further action to address the association of Viagra (Sildenafil) use and increased STD transmission, including HIV infection."

The National Coalition of STD Directors represents the 65 Directors of public health sexually transmitted disease prevention programs in states, large cities/counties, and territories of the United States. NCSD members are on the frontlines, and are keenly aware of the numerous studies showing an association between Viagra use and greater numbers of recent sex partners, higher levels of unprotected anal sex with HIV-positive partners, and higher rates of new STDs, including HIV infection.

Although NCSD has been working with Pfizer on the possibility of changing the Viagra label, NCSD believes the seriousness of this issue necessitates expressing the concerns of our members directly to the FDA. We urge you to follow the San Francisco Department of Public Health's recommendations, which will both increase awareness of this ongoing public health problem and stem the current levels of off-label use.

Again, we would like to voice our support for the current petition from the San Francisco Department of Public Health regarding Viagra use and STD transmission. All steps should be taken to target this important public health issue. We look forward to hearing the FDA's necessary response to this problem. Thank you.

Sincerely,

Theresa Raphael, MPH Executive Director

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National Coalition of STD Directors

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